

NOTAM KICZ A0020/21 – PACTEC Relief Request

- 1) Your name and mailing address and, if you wish, other contact information, such as a fax number, telephone number, or e-mail address. (The FAA may need to contact you if it has questions about your request or needs additional information.)

Stanley R. Unruh
Agent for Service/Deputy Director of Operations
PACTEC International
P.O. Box 28
Nampa, ID 83653
Cell: 208 488 5709
Telephone: (208) 498-0600
Fax: (208) 498-0601
e-mail: sunruh@pactec.net

- 2) A statement that you seek relief from NOTAM KICZ A0020/21.

PACTEC is formally requesting the FAA for relief from NOTAM KICZ A0020/21 due to the ongoing humanitarian efforts by over 100 non-government organizations (NGO) that are registered to use PACTEC's flight service.

- 3) The extent of relief you seek, and the reason you seek the relief.

PACTEC requests the following:

- Immediate approval to carry out security evacuations to mitigate the impact NOTAM KICZ A0020/21 has presented to numerous NGOs.
- Approval of operations for the next two months with the option to reevaluate changes to the security situation.

- 4) The reasons why granting your request would be in the public interest; that is, how it would benefit the public as a whole.

PACTEC has many years of experience providing air service to humanitarian, relief and development agencies in Afghanistan.

- The European Union and the Swiss Government presently partner with PACTEC in financially underwriting the costs of the humanitarian flight services. Immediate suspension of PACTEC air services would leave NGO staff trapped in remote locations with limited, to nonexistent, transportation options. Both the EU and the Swiss governments would most likely be responding through diplomatic channels if its citizens are directly affected by this NOTAM.
- To immediately cease humanitarian aviation support without adequate notice or at least a period of drawdown would not be in the interest of the Afghan people in remote regions, the desire and purpose of humanitarian actors in the region, nor the compassionate intent of the American people.

5. The reasons why granting relief would not adversely affect safety, or how providing the relief would provide a level of safety at least equal to that provided by NOTAM KICZ A0020/21.

NOTAM KICZ A0020/21 issued by the FAA attempts to provide the highest level of safety to the aviation public by mitigating the risk of operations in Afghanistan. PACTEC maintains that security protocols described under number 9 and 10 of this document provides a comparable measure of security that exists around the Kabul airspace, thereby warranting relief by the FAA for other airports/airstrips.

PACTEC and its parent organization have more than 70 years of experience operating in challenging environments in the developing world. PACTEC has made the safety of our pilots and passengers the highest priority.

We believe our security protocols, cultivated from years of operating in Afghanistan, provide a level of operational safety that warrants relief from the requirements found in NOTAM KICZ A0020/21.

6. The proposed operation(s), including the nature of the operation and the date(s) of the proposed operations.

PACTEC has safely and consistently operated in Afghanistan as a humanitarian aviation organization for many years. The operations are supported by the Directorate-General for European Civil Protection and Humanitarian Aid Operations (DG ECHO) subsidies. Routine audits for safety, quality, and financial management are a part of our professional approach to PACTEC operations. PACTEC has an agreement with the Civil Aviation Authority of Afghanistan to operate in the country. Over the years, we have partnered with hundreds of NGO's and flown thousands of hours to provide relief and medical evacuations in support of the Afghan people. Our operations rely on three Daher Kodiak 100's to safely transport workers to many parts of Afghanistan, helping them overcome the constraints of time, inhospitable terrain, and roads that are insecure. We intentionally developed and matured flight operations that are uniquely positioned and specifically suited for the challenges that are inherent to Afghanistan. The service we provide is often the only air service able to assist and support workers in the most remote regions of Afghanistan.

It is our desire to continue that service as long as possible. As we have lived and worked alongside our national colleagues, we have come to understand the fluidity of life in Afghanistan and the complexity of the current situation. We request that you allow us to continue operations for the next two months with an option to reevaluate changes to the security situation.

7. The service to be provided by the person(s) covered by NOTAM KICZ A0020/21, from which you seek relief. –

PACTEC is requesting the approval to continue operating three Daher Kodiak 100's in accordance with our current security protocols outlined below. The service we are providing is safe and reliable air transportation for the many NGO's and humanitarian organizations who work in Afghanistan.

8. The specific locations in the Kabul FIR (OAKX) at altitudes below FL260, except for operations solely to take off from or land at Hamid Karzai International Airport (OAKB), where the proposed operation(s) will be conducted, including, but not limited to, the flight path and altitude of the aircraft while it is operating in the area covered by NOTAM KICZ A0020/21, and the airports, airfields, or landing zones at which the aircraft will take off and land.

PACTEC operates into most parts of the area covered by NOTAM KICZ A0020/21. The following list shows the airports/airstrips used by PACTEC (to be submitted confidentially):

As PACTEC's operation is below FL260 risk mitigation actions must be taken to obtain an acceptable level of safety during operations. PACTEC operates between 13,000 to 18,000' msl on published routes between major airports.

An important risk mitigation action is the avoidance of flights over specific areas or flight below certain altitudes. For locations that are not served by a published route, PACTEC selects routes that avoid areas of insurgent activity based on current security information and aircraft always maintain an altitude above SAF and RPG range. Much of PACTEC operations occur in the central highlands that form a geographic and tribal barrier to insurgent activity.

The PACTEC security team monitors the relevant security information and adjusts routes and minimum altitudes as appropriate. This is described under number 9 and 10 of this document.

9. The method by which the operator will obtain current threat information, and an explanation of how the operator will integrate this information into all phases of its proposed operations (i.e., the pre-mission planning and briefing, in-flight, and post-flight phases).

PACTEC has established a robust network from which it obtains intelligence/threat information. The primary sources through which PACTEC obtains this information are the following:

- i. INSO (International NGO Safety Organization) – INSO is an international organization that supports the safety of aid workers in high-risk contexts through providing accurate and relevant security related information. Afghanistan is one of 14 countries in which INSO is active. The following shows the primary INSO services which PACTEC uses:
 - a. INSO provides a 24/7 Flash Alert through which security incidents are reported (normally within minutes)
 - b. INSO tracks security incidents
 - c. INSO provides security analysis reports
 - d. INSO provides direct access to regional Safety Advisors
- ii. UNHAS – An MOU is established between PACTEC and this U.N. program to share sensitive/confidential security information with each other.
- iii. ICRC (International Committee of the Red Cross) – PACTEC has an established relationship with ICRC. PACTEC and ICRC share security related information as we operate in many of the same areas.
- iv. ACAA (Afghanistan Civil Aviation Authorities) – PACTEC has direct access to the ACAA from which it can obtain certain threat information.
- v. Airport Management – PACTEC requires direct contact with airport management for current threat information 15 minutes prior to landing.
- vi. Local assets – PACTEC has established a robust network of vetted individuals at the various airports/airstrips where PACTEC operates. Through these sources we obtain accurate and current threat information.

As PACTEC pro-actively manages security there is systematic integration of all the obtained security/threat information in its operations in the following ways:

- i. Pre-mission and briefing
 - a. Risk assessments - With the obtained information the PACTEC security team makes risk assessments for every airport where PACTEC operates. The level of risk is re-evaluated daily. Mitigation actions are taken to obtain an acceptable residual risk. To date, PACTEC has not had a single incident of aircraft damage due to small arms fire.
 - b. Pre-departure security check – Before an aircraft is dispatched, the PACTEC security team establishes contact with airport management/local assets for a current security update. Other established sources may also be consulted prior to dispatching an aircraft.
 - c. Pre-flight crew briefing – The PACTEC security team uploads the following security information unto the Electronic Flight Bag that each crew member is required to read prior to dispatch.
 - i. Airport Risk level
 - ii. Identified risks and the required mitigation actions for the specific mission
 - iii. Parts on the routing where low overflight is to be avoided
- ii. In-flight
 - a. The route and altitude of a specific mission is dependent upon current security information, with flight altitudes used to avoid being within firing range of weapons available to extremists and militants.
 - b. Security descents are done to avoid low flight over higher-risk areas. (A security descent is a procedure to descend while directly overhead a secure airport)
 - c. Each aircraft is continuously tracked through satellite tracking.
 - d. The flight crew maintain continuous satellite communication with PACTEC flight tracking staff.
 - e. Prior to landing at high-risk airports, the PACTEC security team will make a final security assessment =< 15 prior to landing. Without the PACTEC security team giving a landing clearance to the pilot, or when no ground contact can be established with our local assets or airport management, PACTEC crew will divert to an alternate site (normally home base).
- iii. Post-flight – The flight crew is debriefed after each mission. Any relevant information will be used to re-evaluate the risk level for the routes and airports. Any relevant information will be shared with other flight crew through the internal NOTAM system.

10. The operator's current assessment of the risk to its proposed civil flight operations in the Kabul FIR (OAKX) at altitudes below FL260, except for operations solely to take off from or land at Hamid Karzai

14) Any additional information, views or arguments available to support your request. If you seek expedited processing of your request for relief, the reason you seek expedited processing. (In addition, if you are seeking expedited processing, you will need to follow the steps listed in the "If you wish to request expedited consideration of your request for relief" section of this document below.)

In closing, PACTEC's security protocols are effective, evidenced by the many years of no security-related incidents.

Why expediency is necessary:

1. There are NGO staff doing crucial humanitarian work for the Afghan people. That work has potentially placed them in locations that could be overrun by government opposition forces in the future. They have been living and working in these locations knowing that if security were ever in question, they could count on PACTEC air services to remove them to safety. PACTEC needs the option to provide these services.
2. PACTEC understands that the FAA's role is to guard the safety of passengers. An effort to quickly respond and allow PACTEC to move humanitarian workers in the safest manner possible, which is by air, and authorizing relief from the NOTAM contributes to the safety of aid workers that rely on PACTEC.

NOTE: Confidential information has been submitted under separate cover.